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August 31, 2005

William Stevens, Esquire
Hearing Officer
Department of Telecommunications & Energy
Commonwealth of Massachusetts
One South Station, Second Floor
Boston, MA 02110

Re: D.T.E. 03-87 – Double Poles Report

Dear Mr. Stevens:

As you had requested, enclosed for filing in the above-captioned matter is an Amended Joint Motion to Modify the Department's June 16, 2005, Procedural Order. It is filed on behalf of the following parties: Boston Edison Company, Cambridge Electric Light Company, Commonwealth Electric Company, Fitchburg Gas and Electric Light Company, Massachusetts Electric Company, Nantucket Electric Company, Verizon Massachusetts, and Western Massachusetts Electric Company.

This Amended Motion includes two changes to the original Motion filed August 10, 2005. First, it amends the original paragraph 8 to include "Number of New Double Poles Remaining that Are Greater than 90 Days." *See* Amended Joint Motion at 4. Second, it eliminates from that paragraph any reference to the category "Transfers Completed" for both the backlog and new double pole reports. *Id.* at 4-5. Upon further review of available data in the PLM database regarding transfer activity, the parties have determined that this would be better addressed in the narratives provided as part of the semi-annual double pole reports filed with the Department. Accordingly, that category has been removed from the spreadsheets originally filed on August 10th.

Appended to this Motion is a new Attachment A to reflect the changes described above.

Letter to W. Stevens, Esq.
August 31, 2005
Page 2 of 2

Thank you for your assistance in this matter.

Very truly yours,

A handwritten signature in cursive script that reads "Barbara Anne Sousa". The signature is written in dark ink and is positioned above the printed name.

Barbara Anne Sousa

Enclosure

cc: Mary L. Cottrell, Secretary
Jeanne Voveris, Esquire
Michael Isenberg, Director-Telecommunications Division
Andrew Kaplan, General Counsel
Service List

COMMONWEALTH OF MASSACHUSETTS
DEPARTMENT OF TELECOMMUNICATIONS AND ENERGY

Double Utility Poles Report

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D.T.E. 03-87

**AMENDED JOINT MOTION TO MODIFY
THE DEPARTMENT'S JUNE 16th PROCEDURAL ORDER**

Boston Edison Company, Cambridge Electric Light Company, Commonwealth Electric Company, Fitchburg Gas and Electric Light Company, Massachusetts Electric Company, Nantucket Electric Company, Verizon Massachusetts, and Western Massachusetts Electric Company (hereinafter jointly referred to as the "Companies") hereby move to modify the procedures and standardized format set forth in the June 16, 2005, Hearing Officer Ruling regarding the filing of semi-annual double pole reports in the above-captioned docket ("Procedural Order"). As described below, the Companies propose some modifications to the Department's format, which will enable the Department to better track the progress of the double pole removal activities in Massachusetts.

Background

1. In its November 28, 2003, report to the Massachusetts Legislature's Joint Committees on Ways and Means and on Government Regulations regarding reducing the number of double utility poles in Massachusetts, the Department, *inter alia*, directed the Companies to provide semi-annual reports updating their progress towards eliminating

the double pole backlog and demonstrating the status of their compliance with the 90-day removal requirement set forth in Mass. Gen. Laws c. 164, § 34B. *See* D.T.E. 03-87, Report at 15 (2003).

2. On June 16, 2005, Hearing Officer William Stevens issued a Procedural Order, which required the Companies to file semi-annual double pole reports using a standardized format that contained pole ownership information and installation and removal data for both the backlog and new double poles¹ on a location specific basis. *See* D.T.E. 03-87, Procedural Order at 2. That Procedural Order also required that the first semi-annual report produced in this new standardized format be submitted by June 30, 2005. *Id.*

3. At the July 19, 2005, technical conference requested by the Companies to discuss compliance with the Department's directives in the Procedural Order, the Companies discussed the availability of backlog and new double pole data from the Pole Lifecycle Management ("PLM") database designed by Inquest Technologies, as well as modifications that may be made to that database to obtain specific data requested by the Department in its Procedural Order on a going-forward basis. The Companies also addressed a possible timeframe that the semi-annual report could be provided to the Department in the new standardized format.

4. As a result of the July 19th technical conference, Hearing Officer Stevens issued a Memorandum on July 20, 2005, requiring that by August 2, 2005, the Companies file a new semi-annual double pole report or, in the alternative, provide a

¹ For purposes of this Motion and the semi-annual report referred to herein, the term "backlog" double poles refers to those placed as of January 31, 2004, and the term "new" double poles refers to those placed after January 31, 2004.

status report indicating when they will submit their proposed revision to the new standardized double pole reporting format, together with a joint motion to modify the Procedural Order accordingly.²

5. On August 2, 2005, the Companies provided their status report to the Department regarding their progress - in collaboration with Inquest Technologies - to develop a revised double pole reporting format to be filed with a joint motion no later than August 10, 2005, along with a projected filing date for the submission of the initial semi-annual double pole report in this new format.

Relief Requested

6. The Companies move to amend the June 16th Procedural Order by substituting a revised Attachment A, appended hereto, in place of the Department's Attachment A to that Procedural Order. As explained below, the Companies' revised Attachment A maintains the basic structure of the Department's backlog and new double pole categories, but provides a more detailed breakdown of that data in a format that is compatible with the PLM database and demonstrates the level of activity associated with the removal of double poles in Massachusetts.

7. The Companies' revised Attachment A contains five components of Massachusetts-specific data: (1) separate summary for backlog double poles; (2) separate summary for new double poles; (3) combined summary for backlog and new double

²

Although the Hearing Officer's July 20, 2005, memorandum also requested that the Companies designate lead counsel for the purposes of coordinating the filing of any joint motions, submitting semi-annual reports, and communicating with the Department, the Companies, by letter dated July 26, 2005, expressed their intent "to continue their efforts to coordinate, where possible, particularly on procedural matters, "rather than designating lead counsel on a formal basis."

poles; (4) a detailed progress report for backlog double poles; and (5) a detailed progress report for new double poles. It is designed in a manner that minimizes any subsequent reprogramming of the PLM database once the Companies complete the removal of backlog double poles and, therefore, eliminate that data from the report entirely. In addition, historical data for the removal of both backlog and new double poles - available by location - will be displayed in the Companies' revised Attachment A.

8. The Companies' revised Attachment A modifies the Department's Attachment A to the Procedural Order by including the following additional detailed information. *First*, "pole ownership" will be sub-divided into the categories of solely owned (by electric or telephone company) and jointly owned.³ The summaries for backlog and new double poles will also include the number of double poles remaining in each city or town by ownership type.⁴ *Second*, in addition to pole number, each backlog and new double pole will be identified by the pole owner's route number and unique PLM identification number, which is necessary to track the level of activity for a double pole in the PLM database. *Third*, to better reflect the data captured in the PLM database, the category of "Number of New Double Poles Remaining That Are Greater Than 90 Days" will replace the category of "Number of New Poles Not Removed in 90 Days."

³ It should be noted that the company listed as Pole Owner 1 on jointly owned double poles generally has pole set responsibility and would be the point-of-contact for the Department regarding the double pole. Notwithstanding that fact, Pole Owner 1 would not necessarily have the responsibility of double pole removal when all equipment and/or facility transfers have been completed. This is governed by the terms of the specific pole ownership agreement between the joint owners. Accordingly, the "pole custodian" category has been eliminated.

⁴ The base of backlog double poles is the number of double poles in place as of January 31, 2004. Thus, the percentage of backlog double poles removed will be calculated using that base. By contrast, the new double poles, as reflected in the summary and detailed progress report, will include those double poles installed on or after February 1, 2004, including but not limited to those added during the reporting period.

9. The Companies propose to submit jointly to the Department the semi-annual double pole report. This will ensure data consistency for a uniform, specific reporting period on a going-forward basis. In addition, the Companies will submit a separate document containing a master list of all double poles by location and pole owner, as well as a separate Company contact list.

10. Finally, based on the programming and engineering work required by Inquest Technologies to modify the PLM database to capture the data required in the new semi-annual double pole report, as described above, the Companies will be able to jointly file their initial semi-annual within 90 days of the Department's approval of this Motion. The Companies urge the Department to approve this Motion as soon as practicable to ensure that this deadline can be met.

Conclusion

For the reasons set forth herein, the Companies respectfully request that the Department grant this motion to modify the Procedural Order as set forth herein.

Respectfully submitted,

MASSACHUSETTS ELECTRIC CO.
NANTUCKET ELECTRIC COMPANY

By Their Attorney,

/s/Amy G. Rabinowitz
Amy G. Rabinowitz
Assistant General Counsel
25 Research Drive
Westboro, MA 01582

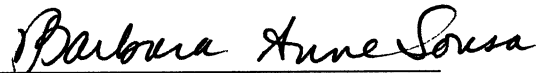
BOSTON EDISON COMPANY
CAMBRIDGE ELECTRIC LIGHT CO
COMMONWEALTH ELECTRIC CO.

VERIZON NEW ENGLAND INC. d/b/a
VERIZON MASSACHUSETTS

By Their Attorney,

/s/David Rosenzweig
David Rosenzweig
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265 Franklin Street
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By Its Attorney,


Barbara Anne Sousa
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185 Franklin Street, 13th Floor
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WESTERN MASSACHUSETTS
ELECTRIC COMPANY

FITCHBURG GAS AND
ELECTRIC COMPANY

By Its Attorney,

/s/Stephen Klionsky
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By Its Attorney,

/s/Gary Epler
Gary Epler
Senior Counsel
6 Liberty Lane West
Hampton, NH 03842

Dated: August 31, 2005

ATTACHMENT A

BACKLOG DOUBLE POLE SUMMARY REPORT

Reporting Period: _____

CITY OR TOWN	POLE OWNERSHIP TYPE	POLE OWNER 1	POLE OWNER 2
TOTAL BACKLOG DOUBLE POLES	REMAINING BACKLOG DOUBLE POLES	DOUBLE POLES REMOVED BACKLOG	% BACKLOG DOUBLE POLES REMOVED
BACKLOG DOUBLE POLE SUMMARY			
TOTALS			

NOTES: The Summary Reports in Attachment A provide all backlog and new double poles recorded in the Pole Lifecycle Management (PLM) database. Backlog double poles are those with a set date on or before January 31, 2004, and new double poles are those with a set date after January 31, 2004. Municipal electric companies that are sole and joint pole owners are included in these Reports.

The following Column Definitions apply to this Summary Report:

CITY OR TOWN

POLE OWNERSHIP TYPE

POLE OWNER 1

POLE OWNER 2

TOTAL BACKLOG DOUBLE POLES

REMAINING BACKLOG DOUBLE POLES

REMOVED BACKLOG DOUBLE POLES

% BACKLOG DOUBLE POLES REMOVED

City or town in which backlog double poles are located.

"JO" or "SO" to indicate joint or sole pole ownership.

Sole owner or first joint owner.

Second joint owner (where JO).

Initial total of backlog double poles as of January 31, 2004.

Backlog double poles remaining at end of reporting period.

Total backlog double poles removed by end of reporting period

Percent of total backlog double poles removed by end of reporting period.

NEW DOUBLE POLE SUMMARY REPORT
Reporting Period: _____

NOTES: The Summary Reports in Attachment A provide all backlog and double poles recorded in the Pole Lifecycle Management (PLM) database. Backlog double poles are those with a set date on or before January 31, 2004, and new double poles are those with a set date after January 31, 2004. Municipal electric companies that are sole and joint pole owners are included in these Reports.

CITY OR TOWN	City or town in which new double poles are located.
POLE OWNERSHIP TYPE	"JO" or "SO" to indicate joint or sole pole ownership.
POLE OWNER 1	Sole owner or first joint owner.
POLE OWNER 2	Second joint owner (where JO).
NEW DOUBLE POLES AT START	New double poles at start of reporting period.
NEW DOUBLE POLES ADDED	New double poles added during the reporting period.
NEW DOUBLE POLES REMOVED	New double poles removed during the reporting period.
NEW DOUBLE POLES REMAINING > 90 DAYS	New double poles remaining at end of the reporting period > 90 days.
NEW DOUBLE POLES REMAINING AT END	New double poles remaining at end of the reporting period.

COMBINED SUMMARY REPORT FOR BACKLOG AND NEW DOUBLE POLES

NOTES: See "Notes" Section of Backlog and New Double Pole Summary Reports in Attachment A for source data and Column Definitions.

ATTACHMENT A

Reporting Period: _____

TOTALS

In addition, see "Notes" Sections for Backlog and New Double Pole Summary Reports in Attachment A for applicable Column Definitions. This Progress Report also contains the location (street address, city or town) for each double pole identified, as well as the following identification numbers for each double pole: PLM ID; Telephone Company Route and Pole Numbers; and Electric Company Route and Pole Numbers.

ATTACHMENT A

Reporting Period: _____

TOTALS

NOTES: This Progress Report provides an itemized listing of all new double poles in the Pole Lifecycle Management (PLM) database. New double poles are those with a set date after January 31, 2004.

In addition, see "Notes" Sections for Backlog and New Double Pole Summary Reports in Attachment A for applicable Column Definitions. This Progress Report also contains the location (street address, city or town)